

June 20, 2003

Re: 03-0104

Dear Sirs:

The ARRL recently petitioned the FCC for a tiny amateur LF allocation in the vicinity of 136 kHz. The electric utility industry claimed in comments on the ARRL's petition that its PLC devices--operating on an unlicensed basis on frequencies below 490 kHz--would suffer harmful interference from 1 W effective isotropically radiated power (EIRP) amateur stations. The FCC agreed and chose not to grant Amateur Radio the LF allocation it sought.

Yet the same utility industry, in consortium with BPL manufacturers, is making the claim that on HF and low-VHF--frequencies where power lines make better antennas than they do on LF--BPL signals can coexist with amateur stations that may be running more than 10,000 W EIRP.

In Japan, On April 30, 2002, the Ministry's study group on PLC held its first public hearing with JARL, Association of Radio Industries and Business, and others. At the meeting, the results of collaborated field tests, which were held in January 2002, were reported. The tests included monitoring leakage of electric waves from power lines -- specifically in cases of providing Internet access via power lines to homes.

As a result, MPHPT's study group officially announced in its fifth meeting on July 31 that it is too early to allow PLC between 2 MHz and 30 MHz due to hazardous effects on HF users. This news was reported by major newspapers including Yomiuri, Asahi and Mainichi, as well as the major financial daily, Nihon Keizai Shimbun.

I am most concerned however that you, the FCC, is looking to promote PLC implementation without consideration to all of the other users of the frequency spectrum. This includes the millions of un-licensed short wave listeners, amateur operators, commercial operators, and even government users. If the power companies cannot co-exist with a 1-watt user, then it stands to reason that the lower power user may be harmed by the electric utility industry massive power line system.

Please reconsider your position and at least take lead from other countries to seriously evaluate the effects of the potential harmful interference. I have always looked to the rules as to protect others from my potential interference; now I look to the FCC to help protect me from other users. I can only do this with your help!

Respectfully

James Whitehouse Amateur Extra License
Commercial License

k1jaw
PG00004255